

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:06CV01064 CEJ
	)	
BETONSPORTS PLC,	)	
	)	
Defendant.	)	
_____	)	

**AFFIDAVIT OF SPECIAL AGENT DAVID RIZI,**

David O. Rizi, being duly sworn, states:

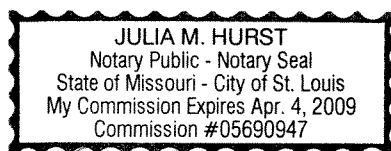
1. I am a Special Agent with the Federal Bureau of Investigation, currently assigned to the St. Louis Office. In the course of my duties investigating computer crimes committed in violation of federal law, I have participated in a multi-agency investigation of illegal internet and telephone gambling enterprises, including one known as BetonSports, PLC (hereafter, "BoS").
2. In the BoS component of the investigation, a federal grand jury issued, on June 1, 2006, a sealed indictment charging the corporation BetonSports, PLC as well as several associated individuals and corporations, for their violation of racketeering and other federal laws. The person I know to then be the Chief Executive Officer (CEO) of BetonSports PLC, David Carruthers, I and another federal Special Agent arrested on July 16, 2006, in the Northern District of Texas. Mr. Carruthers was that day also served with the criminal summons directing his corporation, BetonSports, PLC to appear in the Eastern District of Missouri on July 31, 2006 for arraignment on the indictment.

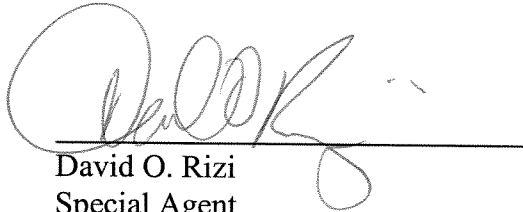
3. I know that the next day, July 17, 2006, Department of Justice attorneys filed pursuant to Title 18, United States Code, Section 1345 an ex parte complaint and supporting documentation which resulted in the issuance by this Court of a temporary restraining order (TRO) against BetonSports, PLC. That same day, July 17, 2006, I served the offices of BetonSports, PLC, with a copy of the TRO by faxing it to the business offices of BetonSports, PLC both in the United Kingdom (at fax number 44-20-7432-4552) and in Costa Rica (at fax number 506-246-3734). I know that the faxes were successfully transmitted because the facsimile machine sending the fax transmission provided me digital confirmation reflecting that both faxes were successfully transmitted to their intended destinations. I know these fax numbers to be those of BetonSports, PLC for reasons including that these numbers were on David Carruthers BetonSports, PLC business card on July 17, 2006, as the numbers at which facsimile transmissions could be sent to his corporation.

4. The next day, July 18, 2006, I personally served David Carruthers, then Chief Executive Officer of BetonSports, PLC, with the TRO at the Bureau of Prisons facility at 3186 Horton Road, Fort Worth, Texas. Several days later, press reports came to my attention reflecting that several days after Mr. Carruthers had been served with the TRO, BetonSports, PLC terminated him from his executive management position with the corporation. I do not know whether those press reports are correct, but I believe they are.

5. Subsequently, I took additional steps to ensure appropriate service on BetonSports, PLC with the assistance of the United States Attorney's Office, I obtained summonses in the civil case United States v. BetonSports, PLC, case number 4:06CV01064 CEJ, with the summonses being directed to "BETONSPORTS PLC." The corporation was directed by the summons to appear at

Thomas F. Eagleton United States Court House, 111 South 10th Street, St. Louis, Missouri 63102, Courtroom 14 North, on Monday, July 31, 2006, at 2:00 p.m. On July 26, 2006, I caused the summons and a copy of the complaint in this matter to be served on BetonSports, PLC (which I know does business in Missouri, but does not maintain its principal place of business in Missouri) by serving those documents on the Missouri Secretary of State's Office, 301 East High Street, Jefferson City, Missouri, which service was made, and accepted, via Federal Express delivery which was made on July 27, 2006, as verified to me through the Federal Express package tracking system. Similarly, on July 26, 2006, I caused the summons and a copy of the complaint to be served on the offices of BetonSports, PLC's counsel in the United States, Steven M. Cohen, of Kranish, Lieb, Weiner & Hellman, LLP, 1114 6th Avenue, New York, New York 10036. The summons and complaint were personally delivered there on July 27, 2006, by FBI Special Agent Maryann Goldman, who later told me that Mr. Cohen acknowledged the delivery of the documents but would not regard the delivery as service on his corporate client. Further, on July 26, 2006, I also served the summons and complaint on the offices of BetonSports, PLC both in the United Kingdom (at fax number 44-20-7432-4552) and in Costa Rica (at fax number 506-246-3734), as I had the TRO. I know the faxes were successfully transmitted because the facsimile machine sending the fax transmission provided me with receipts reflecting that both faxes were successfully transmitted to their intended destinations.



  
 David O. Rizi  
 Special Agent  
 Federal Bureau of Investigation